1. Monitoring wells not used for injection and extraction must be used as the primary source of data for determining contaminant degradation, geochemical conditions representative of the aquifer volumes, and EBR endpoints. Specifically, wells identified as "other wells" on Figures 3-2 through 3-4 of the Revised EBR Work Plan Addendum #2 must be incorporated into the monitoring program.
2. Install x number of monitoring wells in x locations to complete characterization of the groundwater plume.
3. Complete EBR baseline data from each zone must be collected, validated, analyzed, and reported prior to initiating EBR. Microbial and geochemical data collected prior to the initiation of SEE or during SEE are not considered representative of current site conditions.
4. Conduct monthly monitoring of sulfate concentrations in monitoring wells for the first 12 months after the initiation of sulfate injection and report comparisons between model predictions and measures of sulfate concentration in monitoring wells (e.g., graph the predicted sulfate concentration at each monitoring well and the field measures of sulfate as a function of time).
5. Increase COC monitoring frequency once sulfate has been injected in the subsurface (this should be included in Appendix J and an updated sampling plan).
6. Estimates for the time of remediation (TOR) must be provided for each of the three zones. The revised draft final addendum did not include any supporting data or calculations to indicate sulfate reduction as designed would achieve remedial goals in the desired timeframe.
7. Conduct a field test of EBR in the UWBZ as specified in the Final Remedial Design and Remedial Action Work Plan (Amec, 2014) before completing the EBR design.
8. Develop specific (e.g., benzene concentration in LNAPL of XX at YY time after EBR implementation) milestones based on COC concentrations in the site groundwater and LNAPL; the milestones would be derived from predictive modeling of COC attenuation over time.